



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 20, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)

Dear Judge Nathan:

The Government respectfully submits this letter in response to the Court's Order dated May 17, 2021, which directed the Government to confer with defense counsel and submit proposed redactions to Exhibit C to the defendant's memorandum in support of her supplemental pre-trial motions. (Dkt. No. 284).

The Government seeks redactions that are narrowly tailored to protect the privacy interests of victims and third parties referenced in the document. These proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Today the Government is submitting to the Court by email its proposed redactions to Exhibit C, which the Government respectfully requests be filed under seal.

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The Government has conferred with defense counsel in accordance with the Order. The defense has indicated that it has no objection to the Government's proposed redactions to Exhibit C.

Respectfully submitted,

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Cc: Defense counsel (By ECF)